

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 13
MARK IRVING MARTIN	:	
Debtor	:	CASE NO. 1:23-bk-00064
	:	
PENNYMAC LOAN SERVICES LLC	:	
Movant	:	
	:	
vs.	:	
	:	
MARK IRVING MARTIN	:	
Respondent	:	
	:	
	:	
	:	
	:	
	:	

ANSWER TO MOTION FOR RELIEF FROM STAY

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Denied as stated. The confirmed plan provides for different treatment.
7. Denied as stated. The confirmed plan provides for different treatment.
8. Denied. The confirmed plan provides payment in full from proceeds of litigation within one one year of confirmation or stay will lift. The plan was confirmed on 4/27/23.
9. The Debtor lacks knowledge or information sufficient to form a belief as to the truth of this averment, and therefore denies the same.
10. The Debtor lacks knowledge or information sufficient to form a belief as to the truth of this averment, and therefore denies the same.

WHEREFORE, the Debtor respectfully requests that this Court deny the motion for relief filed by the Movant and grant such other relief as this Court deems just.

Respectfully submitted,

/s/ Kara K. Gendron

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